

**TECHNICAL REVIEW DOCUMENT  
for  
RENEWAL of OPERATING PERMIT 00OPEA228**

Eagle County Landfill

Eagle County  
Source ID 0370072

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September 2006

**I. Purpose:**

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewed operating permit proposed for this site. The original Operating Permit was issued September 1, 2001, and expired on September 1, 2006. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted September 2, 2005. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

**II. Description of Source**

The Eagle County Landfill is classified as a municipal solid waste landfill, which falls under the Standard Industrial Classification 4953. The facility is located in Wolcott, Eagle County, Colorado. The area in which the plant operates is designated as attainment for all criteria pollutants. There are no affected states within 50 miles of the plant. The following Federal Class I designated areas are within 100 kilometers of the plant: Rocky Mountain National Park; Flattops

National Wilderness Area; Maroon Bells-Snowmass National Wilderness Area; Mount Zirkel National Wilderness Area, and Eagle's Nest National Wilderness Area.

This source is a municipal solid waste disposal facility accepting non-hazardous waste. The landfill began accepting waste in 1967 and has an anticipated closure date of 2022. Decomposing waste encapsulated within the landfill produces a gas that is primarily composed of methane and carbon dioxide. Emissions of non-methane organic compounds (NMOC), which include, Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP), also result from the decomposition of solid waste placed in the landfill. Fugitive particulate emissions are emitted from the following landfill activities: material transfer to and from storage piles, disturbed areas, wind erosion of storage piles, waste dumping, and vehicle traffic on unpaved roads.

Based on the information provided in the renewal application, no changes have been made to any of the significant emission units. The source has updated the insignificant activity list. The waste acceptance rate and emission limits have been revised based on the APEN dated January 26, 2006.

The summary of emissions that was presented in the Technical Review Document (TRD) for the original permit issuance has been modified to reflect the most recent emission factors and emission estimates (based on historic waste acceptance rates).

**Facility-wide emissions are outlined below:**

Pollutant	Potential-to-Emit (tons/yr)	Actual Emissions (tons/yr)
Fugitive PM <sub>10</sub>	3.76	3.76
Fugitive PM	12.68	12.68
CO	2.21	1.4
VOC	23.70	15.6

The potential-to-emit VOC emissions are calculated from EPA's Landfill Gas Emissions Model (LandGEM). This emission rate is based on the landfill's maximum design capacity. The actual emissions found in the table above are the emissions reported on the most recently submitted APEN.

**Compliance Assurance Monitoring (CAM) Applicability**

The landfill does not utilize any control equipment to meet the limits of this permit. CAM does not apply.

### **III. Discussion of Modifications Made**

#### **Source Requested Modifications**

The Division has updated the waste acceptance rate and emission limits based on the APEN dated January 26, 2006. The emission rates are based on the LandGEM EPA program which is commonly used to estimate landfill emissions.

The insignificant activity list has been updated.

#### **Other Modifications**

In addition to the requested modifications, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

These changes are as follows:

#### **Page following the cover page**

It should be noted that the monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

- Added language specifying that the semi-annual reports and compliance certifications are due in the Division's office and that postmarks cannot be used for purposes of determining the timely receipt of such reports/certifications.

#### **Section I - General Activities and Summary**

- Revised Condition 1.1 to have a more accurate description of the emission sources.
- Conditions 13 and 17 in Condition 1.4 were renumbered to 14 and 18 and Condition 21 in Condition 1.5 was renumbered to 22. The renumbering changes were necessary due to the addition of the Common Provisions requirements in the General Conditions of the permit. In addition, General

Condition 3.g (common provisions, affirmative defense) was added as a State-only requirement.

- Minor language changes were made to Condition 3.1 to more appropriately reflect the status of the source with respect to PSD.
- Based on comments made by EPA on another operating permit, the phrase “Based on the information provided by the applicant” was added to the beginning of Condition 4.1 (112(r)).
- Added a “new” Section 5 for compliance assurance monitoring (CAM).
- Minor descriptive changes to the Condition 6 Table.

#### Section II - Specific Permit Terms

- The requirement to calculate emissions from the landfill gas generation was changed from monthly to annually. The accepted method used to estimate these emissions does not generate valuable results with a monthly calculation. The method is designed only to accurately estimate emissions on an annual basis.
- Added language to require annual compliance with the VOC emissions via EPA’s LandGEM or AP-42 2.4. This is consistent with other recently issued Operating Permits for landfills.
- Modified the NSPS WWW, and Regulation No. 6, Part A, Subpart A, General Provisions language to be consistent with other recently issued Operating Permits for landfills (Conditions 1.3 & 1.4).
- Condition 1.5 was revised to more clearly represent the Regulation No.1 fugitive dust guidelines.

#### Section III – Permit Shield

- The citation in the permit shield was corrected.

#### Section IV - General Conditions

- Added language from the Common Provisions (new condition 3). With this change the reference to “21.d” in Condition 20 (prompt deviation reporting) will be changed to “22.d”, since the general conditions are renumbered with the addition of the Common Provisions.
- Removed the upset and breakdown provisions from Condition 4 (emergency provisions) since they are included in the Common Provisions.

- The citation in General Condition 16 (open burning) was revised. The open burning requirements are no longer in Reg 1 but are in new Reg 9. In addition, changed the reference in the text from “Reg 1” to “Reg 9”.
- The definition of “prompt” has changed. Condition 21 has been updated.
- The language in 22d has been modified slightly.

#### Appendices

- Appendix B & C have been updated to the current version (06/01/2006). The requirement to determine if data was continuous has been removed from Appendix C.
- The table in Appendix F was cleared.